

United States Department of Agriculture

Marketing and Regulatory Programs

Agricultural Marketing Service

Fruit and Vegetable Programs

Processed Products Branch

File Code 147-A-1b

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Domestic Origin Verification (DOV) Audit Program

General Policies and Procedures

PREFACE

This document is designed to give guidance to Processed Products Branch (PPB) personnel of the United States Department of Agriculture (USDA) and to establish the Domestic Origin Verification requirements for applicants who wish to participate in the Domestic Origin Verification (DOV) Audit Program. It provides policies and procedures and establishes the *DOV Specific Requirements*.

The information has been compiled or developed from sources available to the public as well as from technical knowledge of personnel in the USDA.

Compliance with the Agricultural Marketing Service (AMS) guidelines does not excuse failure to comply with the Food, Drug, and Cosmetic Act or any other applicable Federal or State laws or regulations.

This instruction supersedes the following:

File Code 147-A-1b, dated June 2004; Branch Notice 2973, dated August 2005; Branch Notice 2957, dated November 2004; Branch Notice 2953, dated August 2004; and Branch Notice 2949, dated June 2004.

Information concerning inspection and grading services provided by this Branch may be obtained from:

Chief, Processed Products Branch USDA, AMS, Fruit and Vegetable Programs, STOP 0247 1400 Independence Ave., SW Washington D.C. 20250-0247

> Phone: (202) 720-4693 Fax: (202) 690-1527

Terry B. Bane Branch Chief

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Agriculture: Washington

DOMESTIC ORIGIN VERIFICATION AUDIT PROGRAM

GENERAL POLICIES AND PROCEDURES

I. PURPOSE

This document outlines the policies and procedures for the Domestic Origin Verification (DOV) Audit Program (DOV program). It establishes the *DOV Specific Requirements* and provides information and guidance to an applicant for development of its DOV program and process. It also establishes audit procedures.

The DOV program is a means for an applicant to develop an auditable process to verify that commodities intended for delivery to the USDA purchase programs are 100 percent U.S. origin. Fruit and Vegetable Programs (FV) Commodity Procurement Branch (CPB) vendors are required, through contract, to supply only 100 percent U.S. origin commodities to the USDA under its commodity purchase program. An applicant has the option to choose the DOV program or to trace every contract.

The DOV program is funded entirely through user fees. Authority to charge fees for service is provided for under the Agricultural Marketing Act of 1946, as amended, and the Code of Federal Regulations (CFR) Title 7, § 52.51, Regulations Governing Inspection and Certification of Processed Fruits and Vegetables and Related Products. Fees are charged on an hourly basis for assessment of an applicant's DOV written procedures, travel time, on-site auditing, and administrative activities associated with the audit.

II. REFERENCES

Attachment 1 – *DOV Specific Requirements*

Attachment 2 – DOV Quick Guide

Attachment 3 – DOV Application for Service

Attachment 4 – DOV Audit Plan

Attachment 5 – DOV Audit Report

Attachment 6 – DOV Corrective Action Request

Attachment 7 – DOV Approval Letter Example

Attachment 8 – *DOV Denial Letter Example*

Attachment 9 – *DOV Extension Letter Example*

Attachment 10 – DOV Glossary of Terms

ISO 19011:2002 Guidelines for quality and/or environmental management systems auditing

III. RESPONSIBILITIES

Applicants shall meet the applicable policies and procedures outlined in this document. Applicants are responsible for keeping up-to-date with program changes by referencing the DOV Program website at www.ams.usda.gov/fv/ppb.html.

AMS, FV Programs shall meet the applicable policies and procedures outlined in this document. Audit activities are conducted in accordance with *ISO 19011:2002, Section 6, Audit Activities*.

IV. DOV PROGRAM INFORMATION RESOURCES

DOV Coordinator USDA, AMS, FV 121 South 13th Street, Suite FL3 Lincoln, NE 68508

E-mail: DOVS.fv@usda.gov Phone: (402) 742-9154 Fax: (402) 742-9155

The DOV Application for Service, DOV Specific Requirements, DOV General Policies and Procedures, DOV Audit Plan, DOV Audit Report, and DOV Corrective Action Request are available from our website at www.ams.usda.gov/fv/ppb.html.

V. APPLICATION FOR DOV PROGRAM SERVICE

To request DOV program participation and audit service, the applicant shall obtain the *DOV Application for Service* from the DOV Coordinator or from the DOV website as noted above. The completed *DOV Application for Service* along with the applicant's written procedures as described in the *DOV Specific Requirements* shall be submitted by mail to the following address, or it may be e-mailed for faster service if a signed copy of the application is faxed to (402) 742-9155:

DOV Coordinator USDA, AMS, FV 121 South 13th Street, Suite FL3 Lincoln, NE 68508.

A DOV Quick Guide is available on the website noted above as a summarization of the DOV Specific Requirements.

VI. PRE-VALIDATION ASSESSMENT

After the DOV Coordinator receives an applicant's *DOV Application for Service* and related written procedures, receipt is acknowledged, and the Pre-validation Assessment is performed either by the DOV Coordinator or an assigned DOV Specialist. This assessment determines if the applicant's DOV written procedures fully address the *DOV Specific Requirements*. The DOV Coordinator determines if the applicant's procedures are "Adequate," "Requires Clarification," or "Does Not Meet."

Adequate – When the DOV Coordinator or the assigned DOV Specialist determines the applicant's DOV written procedures fully address the *DOV Specific Requirements*, the DOV Coordinator determines the feasibility of the audit and releases it for audit. The DOV Coordinator defines the scope of the audit, assigns an audit tracking number, and assigns the Lead auditor to conduct the audit.

Requires Clarification - If the applicant's DOV written procedures require minor clarifications from the applicant, the DOV Coordinator, or the assigned DOV Specialist works with the applicant to get that information. If the appropriate information is provided, the DOV Coordinator releases the applicant's program for audit.

Does not meet the *DOV Specific Requirements* - If the applicant's written procedures do not address the *DOV Specific Requirements* or indicate that the applicant would need to make numerous corrective actions based on unclear procedures; the DOV Coordinator or assigned DOV Specialist prepares a *DOV Audit Report* for the Pre-validation Assessment indicating the major non-conformances found. This *DOV Audit Report* is sent to the applicant to make necessary adjustments to its program prior to re-submittal.

VII. ON-SITE VALIDATION AUDIT

To become an "Approved DOV Program Participant," an On-site Validation Audit is required to verify the applicant's conformance to the DOV Specific Requirements.

A. Applicant Responsibilities

The applicant will:

- 1. Make pertinent DOV information available, which may include, but is not limited to:
 - a. Company organizational chart,
 - b. Production/Process flow chart(s) for USDA, AMS product,
 - c. Procedures and work instructions,
 - d. Corrective action records,
 - e. Quality records,
 - f. Purchase records.
 - g. Grower records,
 - h. Production records,
 - i. Shipping records, and
 - j. Supplier records and trace-back documents.

- 2. Make the following resources available:
 - a. Applicant's receiving, production, and distribution sites,
 - b. Interview time with key personnel,
 - c. Opportunity to talk with production-level employees on-site,
 - d. Working space for the DOV auditor(s), and
 - e. Appropriate management personnel for the audit and the closing meeting.
- 3. Submit written responses to the *DOV Corrective Action Request(s)* (CAR) within the agreed-to time.

B. DOV Auditor Responsibilities

If only one auditor is assigned, that auditor is the Lead auditor. The Lead auditor may assign the Lead Auditor Responsibilities to an audit team member, except as noted otherwise.

All documents necessary to prepare for and conduct DOV audits are obtained from the DOV Coordinator or designated DOV Specialist. The auditors will electronically prepare and submit the following audit documents to the DOV Coordinator or designated DOV Specialist: DOV Audit Plan, DOV Audit Report, and DOV Corrective Action Request. An applicant's DOV program and relevant documentation will be available in Lotus Notes for access by the assigned auditor(s).

The Lead Auditor will:

- 1. Prepare for the audit by:
 - a. Scheduling an On-site Validation Audit and notifying the applicant of the following information: (1) a proposed audit date(s), (2) the projected cost of the audit, and (3) the name(s) of the auditor(s) scheduled to perform the audit.
 - b. Preparing the *DOV Audit Plan*; reviewing past audits, written procedures, and supporting documentation; electronically submitting the draft *DOV Audit Plan* to the DOV Coordinator or designated DOV Specialist for approval.
 - c. Providing the approved *DOV Audit Plan* to the applicant prior to the audit.
 - d. Assigning work to the audit team if more than one auditor assigned to conduct the audit (Lead Auditor responsibility).
 - e. Preparing documents for reference and for recording audit proceedings.
- 2. Conduct the on-site audit by:
 - a. Conducting the opening meeting.

- b. Communicating during the audit to exchange information and assess the audit progress.
- c. Verifying the applicant's documentation including its written procedures relevant to the audit.
- d. Interviewing appropriate employees to verify their knowledge of the applicant's DOV process and their role in the process.
- e. Conferring prior to the closing meeting to review the audit findings, if an audit team is assigned.
- f. Generating audit findings including the identified major and minor non-conformance(s) and opportunities for improvement (OI). Audit findings are identified as non-conformances or OI. All non-conformances are reported. An OI is not required to be reported on the *DOV Audit Report* but may be reported to assist an applicant in improving its program.

Major non-conformance (MNC): compromises the integrity of the program or product to the extent that the program approval should be denied, revoked, or delayed until effective corrective action can be completed. Any absence or complete breakdown of a program requirement is considered a major non-conformance.

Minor non-conformance (NC): does not compromise the integrity of the program or product. Minor non-conformances not corrected or addressed in a timely manner may be upgraded to a major non-conformance.

Opportunity for Improvement (OI): observations or areas identified as an opportunity for improvement. Although not identified as a non-conformance, it has the potential to become a non-conformance if not corrected or addressed.

- g. Conducting the exit meeting with the applicant to discuss the audit results and findings. The auditor shall not give final disposition (approval or denial of program participation) of the audit when discussing the findings. The auditor discusses a mutually acceptable due date with the applicant for its response to each CAR.
- h. Recording names of meeting attendees.
- 3. Complete the *DOV Audit Report* and CAR(s), obtain approval, and distribute the report within 10 working days of conducting the audit by:
 - a. Drafting the *DOV Audit Report* and applicable CAR(s).
 - b. Submitting, electronically, the draft *DOV Audit Report* and CAR(s) to the DOV Coordinator or designated DOV Specialist for review, guidance, and approval. The DOV Coordinator makes the final determination of the audit findings.

- c. Signing and dating the report once approved by the DOV Coordinator.
- d. Sending the <u>original signed copy</u> to the applicant along with the CAR(s).

4. Conduct audit follow-up by:

- a. Following up on the applicant's response(s) to the CAR(s) to be sure the applicant meets the requested due date(s). On a case-by-case basis, the DOV Coordinator may grant an extension of the due date.
- b. Completing the Auditor's Recommendation Section of the CAR:
 - Once an applicant's response to a CAR is determined acceptable by the auditor and is reviewed and approved by the DOV Coordinator, the auditor completes the "Auditor's Recommendation" section at the bottom of the *Corrective Action Request* noting the response is acceptable, and sends a signed copy of the completed CAR to the applicant.
 - If an applicant's response to a CAR is not acceptable after review and consideration and possible extensions given by the DOV Coordinator, the auditor will not approve the CAR and in the "Auditor's Recommendation" at the bottom of the CAR, the auditor enters "Not recommended for approval because... (stating the reason why)." The auditor sends a signed copy of the completed CAR to the applicant.
- c. Conducting the Follow-up Audit as assigned by the DOV Coordinator, when appropriate, to verify corrective actions.

5. Complete the audit by:

Filing the following official audit records in the applicant's Field Office file with copies sent to the DOV Coordinator:

- *DOV Audit Report*, final signed copy,
- *DOV Corrective Action Request(s)* and applicant's response(s), final signed copies,
- DOV Audit Plan, the one sent to the applicant prior to the audit.
- DOV Application for Service, signed copy, and
- Applicant's DOV written procedures.

VIII. APPROVAL STATUS

- A. The DOV Coordinator will notify an applicant of either its approval or denial into the program based on the results of an On-site Validation Audit, Verification Audit, or Follow-up Audit. The applicant either receives an approval or denial letter.
- B. An applicant approved for participation in the program will receive notification and a certificate indicating it is an "Approved DOV Program Participant."
 - Applicants that have had an acceptable On-site Validation Audit will receive an approval valid for one year from the date of the audit or receipt and resolution of its corresponding CAR(s), whichever is later.
- C. The applicant may agree to have its name, address, and products applicable to the DOV program posted on the USDA Website identifying it as an "Approved DOV Program Participant" at www.ams.usda.gov/fv/ppb.html. The signed DOV Application for Service provides authorization to post the applicant's information on the CPB, PPB, and FPB websites.

IX. MAINTAINING APPROVED PROGRAMS

A. Applicant Responsibilities

The applicant will:

- 1. Keep its DOV procedures updated.
- 2. Immediately notify the DOV Coordinator when it:
 - a. Implements or changes a written procedure to control components or products that are received or purchased, or to segregate domestic from non-domestic including those "not established" as domestic;
 - b. Changes the domestic origin status as stated on the *Application for Service*, or
 - c. Changes the components or products noted in the *Application for Service*.
- B. Depending on the nature, and extent, of the changes, the DOV Coordinator may require a Verification Audit at the applicant's facility.

X. VERIFICATION AUDITS FOR CONTINUED PARTICIPATION

Verification audits of "Approved DOV Program Participants" will be performed at least once a year to verify the applicant's continued adherence to its domestic origin verification program as identified in its procedures. Increased frequency of audits shall depend on the AMS assessment of general or specific risk of non-compliance.

AMS reserves the right to audit more frequently. Factors that <u>MAY</u> increase audit frequencies include, but are not limited to, the following:

- Handling non-domestic components or products,
- Geographic location of the processing facility or where the crops are grown,
- Distressed crops,
- Whistle-blower reports,
- Changes in the applicant's management or key contact person,
- Numerous suppliers (not growers),
- History of non-conformance with domestic origin requirements, and/or
- Multiple components or products.

Verification audits may be conducted as on-site audits or may be desk audits depending on the nature of the participant's program. A *DOV Audit Plan* and *DOV Audit Report* shall be prepared for either type of audit. The DOV Coordinator determines if the audit is to be a desk audit or an on-site audit and the scope of the audit.

Verification audits conducted on-site will follow procedures outlined in Section VII and the desk audits shall follow the same procedures outlined in that section except the audit will not be on-site.

An applicant that has an acceptable Verification Audit receives an annual certificate only if it has been audited at least one time during the 12 month period beginning on the approval date of its On-site Validation Audit and continuing each year thereafter.

XI. DENIAL OF DOV PROGRAM PARTICIPATION AND REINSTATEMENT

- A. USDA, AMS may deny DOV program approval for any of the following reasons if the applicant:
 - 1. Fails to follow the *DOV Specific Requirements* and its related procedures including failure to immediately notify the DOV Coordinator when it (1) implements or changes a procedure to control components or products that are received or purchased, or to segregate domestic from non-domestic including those "not established" as domestic; or (2) changes the domestic origin status as stated on the application; or (3) changes the components or products noted in the application.

- 2. Presents false or misleading information at any point, including in the submission of the *DOV Application for Service* and procedures, during the audit or at any time during program participation.
- 3. Denies USDA reasonable access to its facilities and records within the scope of the DOV program.
- 4. Fails to respond to the *Corrective Action Requests* in the agreed-to time.
- 5. Fails to pay USDA, AMS audit, grading, or other certification fees.
- B. Also, if deemed in the best interest of the USDA, AMS, an applicant's program approval may be denied or revoked. Examples include, but are not limited to, a request by CPB to suspend the applicant for inability to meet contract requirements, customer complaints, or the applicant's inability to provide the required domestic origin documentation.
- C. Prior to denial, the DOV Coordinator shall notify the applicant in writing of the denial, the effective date, and details of actions required to regain approval status, as appropriate. Additional audits may be conducted at the applicant's expense to become reinstated.

XII. CANCELLATION OF AUDITING SERVICE

The applicant may cancel service at any time by notifying the DOV Coordinator. Applicants that cancel service may reapply and be reassessed for DOV program participation.

XIII. FEE FOR SERVICES

The cost of the Pre-validation Assessment, On-site Validation Audits, Verification Audits, and Follow-up Audits, including audit preparation and travel time, are the responsibility of the applicant.

Fees charged for service are charged according to the approved hourly rate for audits in accordance with PPB File Code 109-A-1 (7 CFR § 52.51, Regulations Governing Inspection and Certification of Processed Fruits and Vegetables and Related Products), as referenced by PPB General Memorandum No. 12.

XIV. DOCUMENT CONTROL

- A. Applicant's DOV Program and Related Materials
 - 1. Applicant-related DOV program documentation is securely retained by AMS.
 - 2. Only AMS authorized personnel may access the applicant's DOV program.

- 3. An applicant's DOV program is the property of the applicant and AMS will treat it accordingly. AMS does not retain DOV program materials submitted by applicants who drop from the DOV program and applicants who submit materials that are not approved into the DOV program.
- B. Audit records are retained by AMS for 3 years from the audit date.

XV. RECONSIDERATIONS AND APPEALS

A. Request for Reconsideration

An applicant has the right to request reconsideration of any adverse audit finding or decision issued regarding its participation in the DOV program. Reconsiderations shall be submitted in writing to the DOV Coordinator within 10 working days of the date of the official *DOV Audit Report*, and shall include the basis for the redress and the requested alternative decision or action.

The DOV Coordinator shall review the request for consideration. A written decision is sent to the applicant within 30 working days from receipt of the request.

If the reconsideration concerns denial of DOV program participation, and where the DOV Coordinator upholds a decision to deny DOV program participation, the applicant shall immediately begin providing a trace-back on every USDA contract where its components or products are used. This decision may be appealed but the applicant shall provide trace-backs until the issue is resolved.

B. Request for Appeal

If the resulting decision by the DOV Coordinator concerning the request for reconsideration is not satisfactory to the applicant, the applicant has the opportunity to appeal the DOV Coordinator's decision. Appeals must be within 15 working days of the date of the DOV Coordinator's decision and shall include the basis for the appeal and the requested alternative decision or action. Appeals shall be submitted in writing to the Chief, PPB who confers with FPB, CPB, and the Office of the Deputy Administrator, as appropriate.

FV Programs respond within 30 working days from the date of receipt of the appeal. The applicant shall send the appeal to:

Chief USDA, AMS, FV, PPB 1400 Independence Ave., SW, STOP 0247 Washington D.C. 20250-0247

The result of the decision made by the FV Programs is final.

Domestic Origin Verification (DOV) SPECIFIC REQUIREMENTS

Purpose

This document provides the requirements of a Domestic Origin Verification (DOV) Audit Program (DOV Program). The DOV program is an audit-based program to verify contractors', subcontractors', suppliers', or processors' procedures for ensuring that fruits, nuts, and vegetables sold to the U. S. Department of Agriculture (USDA), Agricultural Marketing Service (AMS) are of 100 percent U. S. origin. The DOV program is a feefor-service program open to all suppliers and their subcontractors. Contractors may choose the DOV program in place of the document trace-back otherwise required for each contract. The USDA, AMS, Fruit and Vegetable Programs (FV), Commodity Procurement Branch (CPB) announcements and invitations define the domestic origin requirements.

Scope

DOV Specific Requirements apply to applicants who voluntarily request participation in the DOV program. Applicants must meet all the applicable requirements outlined in this document to participate in the DOV program.

Due to the nature of an applicant's operation or its products, specific requirements may be considered for exclusion. Exclusions shall be explained by the applicant as to why they do not apply to its program and are limited to requirements in this document within Sections 3.2.a, 3.2.b, and 4.2. Exclusions could also apply to either Sections 2.0.a or 2.0.b, not both. Exclusions shall not affect the applicant's ability to provide conforming components or products that meet the domestic origin requirements in the USDA, AMS, FV, CPB announcements and invitations.

References

USDA, AMS FV, CPB announcement and invitations DOV Program General Policies and Procedures DOV Quick Guide

Definitions

See *DOV Glossary of Terms*

1.0 General Program Requirements

Applicants shall submit a documented program that addresses the following *DOV Specific Requirements:*

- a. General Requirements Establishing, documenting, implementing, and maintaining its DOV procedures and processes;
- b. Requirements for Receiving or Purchasing Components or Products Selecting growers and suppliers based on their ability to provide components or products that are of domestic origin;
- c. Identification and Verification Method Identifying each end item component or product and describing the method for documenting that it came from domestic growers;
- d. Monitoring the DOV Process Verifying the method for documenting that each end item component or product came from domestic origin, preventing the use of components or products not intended for the DOV program, and controlling non-conforming components or products; and
- e. Corrective Action Taking corrective action to eliminate the cause of non-conformances encountered.

The domestic origin verification procedures shall be established, documented, implemented, and maintained to ensure that products delivered to the USDA conform to the requirements of the USDA domestic origin requirement.

These procedures and processes shall be organized in a method to provide easy access for reference and auditing (i.e., a manual).

Top management shall designate a management representative who, regardless of other responsibilities, shall have responsibility and authority that includes:

- a. Ensuring the DOV procedures needed for the applicant's DOV process are established, implemented, and maintained, and
- b. Reporting to the applicant's top management on performance of its DOV program and process.

2.0 Requirements for Receiving or Purchasing Components or Products

The applicant shall have a verifiable written procedure addressing receiving or purchasing domestic origin components or product from growers and suppliers. This relates to components and products that are similar to that delivered to the USDA.

Note: A grower is an individual or entity that develops a fruit, nut, or vegetable through a process of natural growth to maturity (i.e., plant, cultivate, grow, and harvest).

Note: A supplier is someone whose business is to supply a particular service or commodity including, but not limited to, raw materials, components, or finished products (i.e., individual, processor, subcontractor, broker, or contractor). For the purposes of this document, it does not include a grower.

- a. If components are received from growers, the written verifiable procedure shall:
 - 1. Describe the process used to communicate the domestic origin requirement to growers, and to select them based on their ability to provide components or products of domestic origin (i.e., makes it a requirement of purchase, includes in its contracts, field checks, etc.).
 - 2. Include a current list of growers along with evidence they are growers (domestic addresses, field locations, etc.). If there are non-domestic growers, they must be identified as such and included in the procedure for section 4.2.
- b. If components or products are received from suppliers, the written verifiable procedure shall:
 - 1. Describe the process used to communicate the domestic origin requirement to suppliers, and to select them based on their ability to provide components or products of domestic origin.
 - 2. Include a current list of all suppliers who supply components or products similar to that used in USDA contracts regardless of whether or not intended for use in USDA contracts. The list of suppliers shall show the respective components or products for each supplier. If components or products from a supplier are used for domestic components in the applicant's DOV process, the list shall include whether that supplier also handles non-domestic components or products.

3.0 Identification and Verification Method

3.1 Identification

The applicant shall have a verifiable written procedure to identify products (components or raw materials and/or finished products) by suitable means that is unique to the product. It must include a detailed example along with an explanation of the identification (i.e., code or positive lot identification) used to represent each component or product requested for approval into the DOV program. If multiple components or products are requested for DOV program approval, an explanation of each end item code or positive lot identification is needed for each component or product.

The method for identifying the components or products shall be such that the identification transfers through phases of product realization, from receipt through processing to delivery (including warehousing and storage), as applicable.

The identification shall also transfer back to purchased components or products and their origin, as applicable.

3.2 Verification Method

The applicant shall have a verifiable written procedure for the method used for documenting that the end item component or product is of domestic origin. This written procedure shall provide records that are verifiable back to a grower or list of domestic growers. Through documentation, the applicant shall be able to provide the history, location, or activity of the component or product, as applicable, from the end item back to its domestic origin (growers).

Note: An acceptable method for documenting domestic origin is trace-back. Methods of tracking or verifying domestic origin may vary depending on the facility. It may or may not include working back through every step of receipt, packing, processing, or warehousing.

a. If raw components are not <u>directly</u> received from growers, but have gone through an intermediary facility or stage of receipt and have not changed form (processed), the applicant shall include in its verifiable written procedure how it ensures the components maintain their domestic origin integrity through the intermediary facilities or stages of receipt.

These facilities or stages of receipt may include, but are not limited to, receiving stations, produce packing facilities, and warehouses, as applicable.

If the component has changed form (processed), follow the requirements in (b).

b. If processed components or products are received or purchased from a supplier(s), the applicant shall include in its verifiable written procedure how the supplier ensures that the components or products maintain domestic origin integrity prior to receipt by the applicant.

Note: Current acceptable methods are: (1) the supplier is an "Approved DOV Program Participant" or (2) the supplier shall provide a traceback to the applicant for every USDA contract where its components or products are used. The applicant shall have a record of reviewing these trace-backs for adequacy and the trace-backs shall be on file.

4.0 Monitoring the Domestic Origin Verification Process

4.1 Verification Activity

At least once a year, for each component or product in the DOV program, the applicant shall verify the method described in Section 3.2 and be able to show evidence of its verification activity through records. If a non-conformance is found during the verification by the applicant, it shall be corrected. Non-conformances and their corrective action shall be documented.

4.2 Segregating and Preventing the Use of Components or Products Not Intended for Customers Requiring Domestic

The applicant shall have a verifiable written segregation procedure addressing the process for preventing the use of components or products that are non-domestic and those "not established" as domestic in its products destined for customers requiring only domestic, including USDA. This refers to those components or products that are similar to that delivered to the USDA.

- a. As applicable, the verifiable written procedure shall include the process or segregation procedure for preventing the use of non-domestic components or products that are not intended for USDA. The written procedure for known "non-domestic" components or products shall include:
 - 1. Positive identification from receipt, through processing, packaging, storage, and shipment to show a clear distinction between the domestic components or products intended for USDA and those non-domestic that are not intended for USDA;
 - 2. Release authority; and
 - 3. Physical separation, as applicable.
- b. As applicable, the verifiable written procedure shall also include the process for preventing the use of components or products that are "not established" as domestic and are not intended for USDA. Components or products "not

established" as domestic are those from suppliers who are not "Approved DOV Program Participants" or when the applicant has no trace-back(s) on file from suppliers when required under this program (see 3.2.b). The verifiable written procedure shall include:

- 1. Positive identification from receipt, through processing, packaging, storage, and shipment to show a clear distinction between the domestic components or products intended for USDA and those "not established" as domestic;
- 2. Release authority; and
- 3. Physical separation, as applicable.

4.3 Controlling Non-conforming Components or Products

The applicant shall have a verifiable written procedure to control non-conforming components or products in its DOV process.

Non-conforming components or products are a quantity of product that is purchased, received, processed, packed or shipped that is not controlled by the applicant's DOV procedures, and does not fulfill the specified domestic origin requirement.

The procedure shall include the following elements, as applicable, based on the applicant's operation:

- 1. Identifying and segregating non-conforming components or products;
- 2. Determining its disposition;
- 3. Authorizing release, such as for a program other than the applicant's DOV process;
- 4. Maintaining records of all non-conforming components or products and any subsequent actions taken;
- 5. Determining the cause of the non-conformance and taking action so that it does not occur again; and
- 6. Immediately reporting to the USDA, AMS, FV, CPB if non-domestic product is shipped to the USDA. A notification shall also be sent to the USDA, AMS, FV, Processed Products Branch field office in the applicant's area. Field office locations may be found at www.ams.usda.gov/fv/ppb.html.
- 7. Immediately, notify the DOV Coordinator when a non-conformance is found and it results in a necessary change in the applicant's DOV procedures, a change in its domestic origin status, or a change in the components or products noted in the Application for Service.

5.0 Corrective Action

The applicant shall take action to eliminate the cause of non-conformances in order to prevent recurrence.

Corrective actions shall be appropriate to the operation and non-conformances encountered.

The applicant shall maintain records of corrective actions taken either through their audit process or through the audit by AMS.

Domestic Origin Verification (DOV) QUICK GUIDE

- This guide is based on the DOV Specific Requirements.
- The DOV procedures shall be organized in a method to provide easy access for your company's reference and auditing, i.e., a manual.
- All requirements shall be addressed. Exclusions shall be explained by the applicant as to why they do not apply to its program and are limited to requirements 3.2.a, 3.2.b, and 4.2. Exclusions could also apply to either Section 2.0.a or 2.0.b, not both.

Domestic Origin Verification Quick Guide

1.0 General

Who is responsible for ensuring that the DOV procedures needed for the applicant's DOV process are established, implemented, and maintained and is responsible for reporting to top management on the applicant's DOV program performance? Provide that name in your manual.

2.0 Requirements for Receiving or Purchasing Components or Products

The applicant shall have a <u>verifiable written procedure</u> addressing receiving or purchasing domestic origin components or products from growers and/or suppliers.

Note: A grower is an individual or entity that develops a fruit, nut or vegetable through a process of natural growth to maturity (i.e., plant, cultivate, grow, and harvest).

Note: A supplier is someone whose business is to supply a particular service or commodity including, but not limited to, raw materials, components, or finished products (i.e., individual, processor, subcontractor, broker, or contractor). For the purposes of this document, it does not include a grower.

- a. If components are received from growers, the written verifiable procedure shall:
 - 1. Describe the process used to communicate the domestic origin requirement, and select growers based on their ability to provide components or products of domestic origin (i.e., makes it a requirement of purchase, includes in its contracts, field checks, etc.).
 - 2. Include a current list of growers along with evidence they are growers (domestic addresses, field locations, etc.). If there are non-domestic growers, they must be identified as such, and included in the procedure for section 4.2.
- b. If components or products are received from suppliers, the written verifiable procedure shall:
 - 1. Describe the process used to communicate the domestic origin requirement, and select suppliers based on their ability to provide components or products of domestic origin (i.e., makes it a requirement of purchase, includes in its contracts, requires DOV participation, requires trace-backs for every USDA contract, etc.)..
 - 2. Include a current list of all suppliers who supply components or products similar to that used in USDA contracts regardless of whether or not intended for use in USDA contracts. The list of suppliers shall show the respective components or products for each supplier. If components or products from a supplier are used for domestic components in the applicant's DOV process, the list shall include whether that supplier also handles non-domestic components or products.

Domestic Origin Verification Quick Guide

3.0 Identification and Verification Method

3.1 Identification

What is your company's procedure to identify the end item? The <u>verifiable written procedure</u> for identifying the end item (code or positive lot identification) shall be included giving a detailed example of that identification along with its explanation. If multiple components or products are requested for DOV program approval, an explanation of each end item code or positive lot identification is needed for each component or product.

3.2 Verification Method

What is your company's method for tracking the end item component or product to show that it came from domestic growers?

Your company shall have a <u>verifiable written procedure</u> for the method used for documenting that the end item component or product is of domestic origin. Through documentation, your company shall be able to provide the history, location, or activity of the component or product, as applicable, from the end item back to its domestic origin (growers).

Note: An acceptable method for documenting domestic origin is trace-back, a method beginning at the end of a process (code or positive lot identification) and working back through the process either to the beginning or to a designated point to verify that the end item came from growers of domestic origin. Methods of tracking or verifying domestic origin may vary depending on the facility. It may or may not include working back through every step of receipt, packing, processing, or warehousing.

- a. If raw components are not received **directly** from growers but have gone through an intermediary facility or stage of receipt and have not changed form (processed), the applicant shall include in its verifiable written procedure how it ensures the components or products maintain their domestic origin integrity through the intermediary facilities or stages of receipt. These facilities or stages of receipt may include, but are not limited to receiving stations, produce packing facilities, and warehousing, as applicable. If it has changed form (processed), follow the requirements for (b) as follows.
- b. <u>If processed components or products are received from a supplier</u>, the applicant shall include in its verifiable written procedure how the supplier ensures that the components or products maintain domestic origin integrity prior to receipt by the applicant.

Note: Current acceptable methods are:

- (1) the supplier is an "Approved DOV Program Participant" or
- (2) the supplier shall provide a trace-back to the applicant for <u>every</u> USDA contract where the components or products are used. The applicant shall have a <u>record</u> of reviewing these trace-backs for adequacy and the trace-backs shall be on file.

4.0 Monitoring the Domestic Origin Verification Process

4.1 Verification Activity

At least once a year, for each component or product in the DOV program, the applicant shall verify the method described in Section 3.2 and be able to show evidence of its verification through **records**. If a non-conformance is found by the applicant during its verification process, corrective action shall be taken and documented. The applicant's annual verification activity records shall be on file for review by the DOV Auditor.

Domestic Origin Verification Quick Guide

4.2 Segregating and Preventing the Use of Components or Products Not Intended for Customers Requiring Domestic

The applicant shall have a verifiable written segregation procedure addressing the process for preventing the use of components or products that are non-domestic and those "not established" as domestic in its products destined for customers requiring only domestic, including USDA. This refers to those components or products that are similar to that delivered to the USDA.

- a. As applicable, the verifiable written procedure shall include the process or segregation procedure for preventing the use of non-domestic components or products that are not intended for USDA. The written procedure shall include:
 - Positive identification from receipt, through processing, packaging, storage, and shipment to show a clear distinction between the domestic components or products intended for USDA and those non-domestic that are not intended for USDA;
 - 2. Release authority; and
 - 3. As applicable, physical separation.
- b. As applicable, the verifiable written procedure shall also include the process for preventing the use of components or products that are "not established" as domestic and are not intended for USDA. Components or products "not established" as domestic are those from suppliers who are not "Approved DOV Program Participants" or when the applicant has no trace-back(s) on file from suppliers when required under this program (see 3.2.b). The verifiable written procedure shall include:
 - 1. Positive identification from receipt, through processing, packaging, storage, and shipment to show a clear distinction between the domestic components or products intended for USDA and those "not established" as domestic;
 - 2. Release authority; and
 - 3. As applicable, physical separation.

4.3 Controlling Non-conforming Components or Products

The applicant shall have a verifiable written procedure to control non-conforming components or products.

Note: Non-conforming components or products are a quantity of product that is purchased, received, processed, packed or shipped that is not controlled by the applicant's DOV procedures and does not fulfill the specified domestic origin requirement.

The procedure shall include the following elements, as applicable, based on the applicant's operation:

- 1. Identifying and segregating non-conforming components or products;
- 2. Determining its disposition;
- 3. Authorizing release, such as for a program other than the applicant's DOV process;
- 4. Maintaining records of all non-conforming components or products and any subsequent actions taken;
- 5. Determining the cause of the non-conformance and taking action so that it does not occur again; and
- 6. Immediately reporting to the USDA, AMS, FV, CPB if non-domestic product is shipped to the USDA. A notification shall also be sent to the USDA, AMS, FV, Processed Products Branch field office in the applicant's area. Field office locations may be found at www.ams.usda.gov/fv/ppb.html.
- 7. Immediately, notify the DOV Coordinator when a non-conformance is found and it results in a necessary change in its DOV procedures, a change in its domestic origin status, or a change in the components or products noted in the Application for Service.

5.0 Corrective Action

Corrective action <u>records</u> relating to non-conformances in the applicant's DOV process shall be maintained either when identified by the applicant or when found during a DOV program audit.

Domestic Origin Verification (DOV) APPLICATION FOR SERVICE

			OMB Approved No. 0581-0234
Name and Address of Facility Where Audit Ser	vices Are Requested:		
Billing Address			
List the components and products that are products):	requested for DOV program	approval (Fruit, nut, or vegeta	ble components and/or
Check Appropriate Domestic Origin Statu Process and/or handle ONLY domestic from suppliers that are similar to that of Marketing Service (AMS). Process and/or handle domestic and no product from suppliers that are similar "not established" as domestic are conti	c fruit, nut, and vegetable co lelivered to the United States on-domestic fruit, nut, and ve to that delivered to the USD	Department of Agriculture (US) getable components or product A. Non-domestic components	SDA), Agricultural s that may include finished
I (we) agree: 1. To comply with all applicable provices and Commodities or Services, and Commodities	modity Procurement Branch ies and provide all documen ordinator when it (1) implemed, or to segregate domestic tic origin status as stated on AMS, Fruit and Vegetable Pror products are shipped to the cation for Service and related quests. program approval if deemed lude, but are not limited to, to suspend the applicant for in regarding this approval on the applicant's information on	(CPB) announcements, specific tation or records within the scopents or changes a procedure to from non-domestic including the application; or (3) changes to rograms (F&V), CPB and the new USDA. It verifiable written procedures. In the best interest of the USDA he inability to provide the requirement used to the use of	eations, and invitations. pe of the DOV program. control components or hose "not established" as the components or products earest PPB Field Office A, AMS. Reasons for ired domestic origin ments, or customer ning this application
Signature of Applicant or Representative:	Title of Applicant Represe	entative: Date:	
Print or Type Name of Signer:	Telephone No.:	E-mail address of Appl	licant's Representative:
Return the application and related docu USDA, AMS, FV, DOV Coord 121 South 13 th Street, Suite FL	inator	Telephone: (4	OVS.fv@usda.gov 02) 742-9154 02) 742-9155

According to the Paperwork Reduction Act of 1995, an agency may not conduct or sponsor, and a person is not required to respond to a collection of information unless it displays a valid OMB control number. The valid OMB control number for this information collection is 0581-0234. The time required to complete this information collection is estimated to average 2.25 hours per response, including the time for reviewing instructions, searching existing data sources, gathering and maintaining the data needed, and completing and reviewing the collection of information. The U.S. Department of Agriculture (USDA) prohibits discrimination in all its programs on the basis of race, color, national origin, gender, religion, age, disability, political beliefs, sexual orientation, and marital or family status. (Not all prohibited bases apply to all programs.) Persons with disabilities who require alternative means for communication of program information (Braille, large print, audiotape, etc.) should contact USDA's TARGET Center at 202-720-2600 (voice and TDD). To file a complaint of discrimination, write USDA, Director, Office of Civil Rights, Room 326-W, Whitten Building, 1400 Independence Avenue, SW, Washington, DC 20250-9410 or call 202-720-5964 (voice and TDD). USDA is an equal opportunity provider and employer.

FV-DOV-1 (05-06)

Lincoln, NE 68508

Domestic Origin Verification (DOV) AUDIT PLAN

The DOV auditor is responsible for preparing this plan for the activities of the DOV audit. The Audit Plan is discussed with the auditee during the opening meeting.

Auditor's Name (Print Name)	
2 nd Auditor (Print Name)	
Name of Facility (Auditee)	
Auditee Street Address (Where the on-site audit is conducted.)	
Auditee Contact:	
Auditee Phone Number:	
Purpose of Audit (Pre-validation Assessment, Validation Audit, Verification Audit, or Follow-up Audit)	
Scheduled Audit Date:	

The "REMARKS" area may be used to take notes or record information needed for the audit.

Audit Activities	REMARKS
1. Opening meeting	
2.	
3.	
4.	
5.	
6.	
7.	
8.	
9.	
10. Closing meeting	

Domestic Origin Verification (DOV) AUDIT REPORT

Name of Audited Facility:		Applicant:			Date of Au	ıdit:
Address: (Street, City, Zip)			Billing Address:			DOV ID#:
Key Contact for Audit:		Telephone of Key Contact for Compandit:		emponents or	pponents or Products:	
Type of Audit	☐ Pre-validation Asse	essment	□ Validation □	Ver	ification	☐Follow-up
Audit Scope		Specific Elements, Pl	lease	list:		
Lead Auditor's Name:		Lead Auditor's Signature:		Date Sent to Applicant:		
Names of Attend	dees at Closing Meeting	g:			1	
Please prepare a	Corrective Action Resp DOV Audit Program	onse for	each Finding and submit	it to:	DOVS.fv@us	sda.gov

DOV Audit Program USDA, AMS F&V 121 South 13th Street, Suite FL3 Lincoln, NE 68508 Fax: (402) 742-9155

Corrective Action Response (CAR) Due Date:

CAR Number	Program Criteria Number	*NC, MNC, or OI	Findings

- NC is a Minor Non-conformance. It does not compromise the integrity of the program or product. A NC that is not corrected or addressed in a timely manner may be upgraded to a Major Non-conformance.
- MNC is a Major Non-conformance. It compromises the integrity of the program or product to the extent that program approval should be denied, revoked, or delayed until effective corrective action can be completed.
- OI is an observation or Opportunity for Improvement. It is not a Non-conformance but has the potential to become a Non-conformance if not corrected or addressed.

Domestic Origin Verification (DOV) AUDIT REPORT DETAILS

Program approval may be denied or delayed (Pre-validation Assessment and Validation audit) or may be revoked (Verification and Follow-up Audits) if any criteria is answered "No."				
Program Criteria Number	Program Criteria	Yes, No, N/A	Auditor's Notes	
1.0	General Requirements			
1.0	Is the applicant's DOV process established, documented, implemented, and maintained?			
1.0	Is there a designated person(s) who has defined authority for ensuring that the domestic origin verification system is established, implemented, and maintained?			
1.0	Is the applicant's DOV program and procedures organized in a method to provide easy access for reference and auditing?			
2.0	Requirements for Receiving or Purchasing Components or Products			
2.0.a	If applicable, does the applicant have a verifiable written procedure it follows addressing receiving or purchasing domestic origin components or products from growers?			
2.0.a.1	Is the domestic origin requirement communicated to the growers by some means?			
2.0.a.2	Is there a list of growers with evidence they are domestic growers?			
2.0.b	If applicable, does the applicant have a verifiable written procedure it follows addressing receiving or purchasing domestic origin components or products from suppliers?			
2.0.b.1	Is the domestic origin requirement communicated to the suppliers by some means?			
2.0.b.2	Is there a list of suppliers?			
3.0	Identification and Verification Method			
3.1	Identification			
3.1	Does the applicant have a verifiable written procedure it follows for explaining the end item identification (code or positive lot identification) for each component or product listed on its DOV Application for Service?			

Program Criteria	Program Criteria		Auditor's Notes
Number			
3.2	Verification Method		
3.2	Does the applicant have a verifiable written procedure for the method used to document that the end item component or product is of domestic origin?		
3.2	If so, when an end item code is requested for trace-back, does the applicant use the documents included in the procedure described in 3.2 and do the documents verify domestic origin?		
3.2.a	If applicable, does the verifiable written procedure include how the applicant ensures the components not obtained directly from growers maintain their domestic origin integrity through the intermediary facilities or stages of receipt?		
3.2.b	If applicable, does the verifiable written procedure include how the applicant ensures the components or products maintain domestic origin integrity prior to receipt by the applicant when received from suppliers?		
4.0	Monitoring the Domestic Origin Verification Process		
4.1	Verification Activity		
4.1	At least once a year, has the applicant verified the method described in Section 3.2 for each product and does it have that verification on file? Also, if a non-conformance was found by the applicant, was it corrected and documented?		
4.2	Segregating and Preventing the Use of Components or Products Not Intended for Customers Requiring Domestic		
4.2.a	If applicable, does the applicant have a verifiable written procedure it follows addressing the process for preventing the use of non-domestic components or products, similar to that delivered to the USDA, that are not intended for USDA?		
4.2.a.1	Does the procedure include positive identification from receipt, through processing, packaging, storage and shipment to show a clear distinction between the domestic components or products intended for USDA and the non-domestic that are not intended for USDA?		
4.2.a.2	Does the procedure include release authority?		
4.2.a.3	If necessary, does the procedure include physical separation?		

Program Criteria Number	Program Criteria	Yes, No, N/A	Auditor's Notes
4.2.b	If applicable, does the applicant have a verifiable written procedure it follows addressing the process for preventing the use of components or products that are "not established" as domestic and are not intended for USDA.		
4.2.b.1	Does the procedure include positive identification from receipt, through processing, packaging, storage and shipment to show a clear distinction between the domestic components or products intended for USDA and the components "not established" as domestic?		
4.2.b.2	Does the procedure include release authority?		
4.2.b.3	If necessary, does the procedure include physical separation?		
4.3	Controlling Non-conforming Components or Products		
4.3	Does the applicant have a verifiable written procedure it follows to control non-conforming components or products?		
4.3	Does it include notification of the DOV Coordinator when a non-conformance is found and it results in a necessary change in its DOV procedures, a change in its domestic origin status, or a change in the components or products noted in the Application for Service?		
5.0	Corrective Action		
5.0	Does the applicant maintain corrective action records?		

Domestic Origin Verification (DOV) CORRECTIVE ACTION REQUEST (CAR)

For Applicant Submittal to USDA in Response to DOV Audit Report

	CAR Number
Name of Facility Audited:	Location of Audit:
Audit Date:	Corrective Action Due Date:
Auditor:	
	action response to be submitted by your company. Please respond to the Only record the corrective action for one non-conformance per page.
Non-conformance (Major or Minor):	omy record the corrective detail for one non-comormance per page.
Facility's Corrective Action Response:	
ruemty s corrective reason response.	
Applicant's Representative:	Date Submitted to USDA:
Submit to: dovs.fv@usda.gov	
If electronic submission is not possible, either	mail or fax to:
DOV Coordinator	
USDA, AMS, F&V	
121 South 13 th Street, Suite FL3	
Lincoln, NE 68508	
Fax (402) 742-9155	
	USDA USE ONLY)
Date Response Received:	DOV ID#:
Auditor's Recommendation:	
Auditor's Signature:	Date:



United States Department of Agriculture Date:

Marketing and Regulatory Programs John Doe, President YY Company P.O. Box 0000 Madison, WI 53701

Agricultural Marketing Service

Dear Mr. Doe:

Fruit and Vegetable Programs

We are pleased to inform you that Enter applicant's name (for example, YY Company, Madison, Wisconsin) has been approved to participate in the Domestic Origin Verification (DOV) Program. This approval extends through enter date of

Processed Products Branch

<u>certificate</u>, as indicated on your enclosed DOV program certificate.

STOP 0247 1400 Independence Ave., SW Washington, D.C. 20250-0247 Now that you are an approved participant in the DOV program, your DOV certificate is the document to use as confirmation that USDA has verified your domestic origin system. The USDA, AMS, Fruit and Vegetable Programs, Commodity Procurement Branch Website publishes your company's name and address so your customers can readily see that you are approved into the DOV program.

If you have any questions, please contact us.

Sincerely,

Name

Chief, Processed Products Branch Fruit and Vegetables Program



Enclosures



Date:

United States Department of Agriculture

Marketing and Regulatory Programs Jane Doe, President YY Company

P.O. Box 0000 Madison, WI 53701

Agricultural Marketing Service

Dear Ms. Doe:

Fruit and Vegetable Programs We regret to inform you that your facility located at <u>enter address of facility audited</u> has not been approved into the Domestic Origin Verification (DOV)

Program.

Processed Products Branch

The reason(s) for this denial is:

STOP 0247 1400 Independence Ave., SW Washington, D.C. 20250-0247

If you have any questions, please contact the DOV Coordinator at the following address:

DOV Coordinator USDA, AMS, FV

121 South 13th St., Suite FL3

Lincoln, NE 68508 Fax: (402) 742-9155 Phone: (402) 742-9154

Sincerely,

Name

Chief, Processed Products Branch Fruit and Vegetable Program

cc:





United States Department of Agriculture

Date:

Marketing and Regulatory Programs Jane Doe, President YY Company P.O. Box 0000 Madison, WI 53701

Agricultural Marketing Service

Dear Ms. Doe:

Fruit and Vegetable Programs

Enter applicant's name (for example, YY Company, Madison, Wisconsin) has been given an extension of enter time period (for example, one month) in its Domestic Origin Verification Program participation due to enter reason for the extension (for example, the delayed production because of the expansion of this

facility).

Processed Products Branch

STOP 0247 1400 Independence Ave., SW

Ave., SW Washington, D.C. 20250-0247 This extended approval is through <u>enter date</u> for the products indicated on the enclosed DOV certificate.

If you have any questions, please contact the DOV Coordinator at the following address:

DOV Coordinator USDA, AMS, FV

121 South 13th Street, Suite FL3

Lincoln, NE 68508 Fax: (402) 742-9155 Phone: (402) 742-9154

Sincerely,

Name

Chief, Processed Products Branch Fruit and Vegetable Programs

cc:



XVI. GLOSSARY OF TERMS

Agency: The Agricultural Marketing Service (AMS) of the USDA.

Applicant: the entity that is responsible for establishing, documenting, implementing, and maintaining its DOV program and for payment of the auditing services.

Approved DOV Program Participant: any entity that has applied for service and met the *DOV Specific Requirements* as established through the audit process described in the *DOV General Policies and Procedures*.

Auditee: the facility being audited.

Code: a unique and permanent finished product identification required for fruit and vegetable processed product lots.

Commodity Procurement Branch (CPB): branch within USDA's Agricultural Marketing Service's Fruit and Vegetable Programs responsible for purchasing fruits, nuts and vegetables for nutrition programs.

Component or Product: any fresh or processed fruit, nut or vegetable used as an ingredient in product destined for delivery to the USDA. (Note: the phrase fruit, nut, or vegetable is used instead of only fruit and vegetable because this DOV program is used by CPB and the Fresh Products Branch.)

Contractor: a person, agency, corporation, or other legal entity obligated under a contract with the Agency.

Corrective Action Request (CAR): the document the auditor uses to individually record the non-conformances reported on the summary page of the *DOV Audit Report*. The auditee is required to respond to each CAR with its resolution to the deficiency or non-conformance.

Documentation: documents and records prepared and maintained by the auditee that describe the facility's procedures for ensuring that products or components handled conform to *DOV Specific Requirements*. The documentation may be in the form of a well-defined manual or an accumulation of program documents and records.

Domestic Origin: processed products delivered under the USDA purchase programs originating from crops grown, processed, and packed in the United States, its territories or possessions, the Commonwealth of Puerto Rico, or the Trust Territories of the Pacific Islands (hereinafter referred to as the United States). See CPB announcements, and invitations.

Domestic Origin Verification (DOV) Program: an audit program to evaluate an applicant's procedures for ensuring that only domestic origin products are delivered under the USDA purchase program. The program is available to contractors, subcontractors, suppliers, processors, and any financially interested party.

DOV Auditor: an AMS employee who has received training and met all the requirements for performing audits on the DOV Audit Program.

DOV Audit Report: the document the auditor uses to record information during the on-site audit. It has a summary page to report deficiencies and non-conformances found during the audit.

DOV Audit Plan: the document the auditor uses to prepare for the on-site audit by documenting the activities planned during the audit.

DOV Coordinator: the AMS employee who is trained in the DOV program and manages it.

DOV Quick Guide: the document that summarizes the *DOV Specific Requirements* provides a quick reference to the requirements.

DOV Specialist: An auditor trained in the DOV Audit Program and who is responsible for assisting the DOV Coordinator in performing Pre-validation Assessments, performing audits, and training auditors.

Entity: any company or individual supplying a fruit, nut, or vegetable component or product for a USDA contract.

Finding: a deficiency or non-conformance found during an audit, that requires corrective action.

Follow-up Audit: an audit conducted to verify effectiveness of corrective actions resulting from either a validation or verification audit.

Grower(s): an individual or entity that develops a fruit, nut, or vegetable through a process of natural growth to maturity (i.e., plant, cultivate, grow, and harvest).

Handle: to engage in the buying, distributing, or selling of a fruit, nut, or vegetable component or product (purchase, receive, store, process, warehouse, or ship).

Non-conformance: a parameter, which does not meet the *DOV Specific Requirements* or the applicant's domestic origin specifications or program.

Non-conforming component or product: a quantity of product that is purchased, received, processed, packed or shipped that is not controlled by the applicant's DOV program and procedures, and does not fulfill the specified domestic origin requirement.

Non-domestic: components or products that did not originate from crops grown, processed, and packed in the United States. Non-domestic is synonymous with imported.

On-site Validation Audit: the initial on-site audit to review the supplier's facilities, procedures, and records to determine conformance with the *DOV Specific Requirements*.

File Code 147-A-1b May 2006 Attachment 10

Opportunity for Improvement (OI): observations or areas identified as opportunities for improvement. Although not identified as non-conformances, an OI has the potential to become a non-conformance if not corrected or addressed.

Pre-validation Assessment: a review performed off-site (not at the applicant's facility) prior to the On-site Validation Audit that established whether or not the applicant has submitted complete documentation (verifiable written procedures) for its DOV processes in accordance with the *DOV Specific Requirements*.

Processor: a facility that converts raw components or product into finished product. Such a facility may also be a contractor, subcontractor, supplier, or processor.

Segregation Procedure: a document that is prepared and maintained that describes the facility's process for preventing the commingling of domestic and non-domestic product or product "not established" as domestic.

Similar: component or product possessing the same or almost the same characteristics.

Subcontractor: an individual or entity that performs part or all of the contract for the contractor.

Supplier: someone whose business is to supply a particular service or commodity including, but not limited to, raw materials, components, or finished products (i.e., individual, processor, subcontractor, broker, contractor). For the purposes of this document it does not include a grower.

Verification Audit: an audit that verifies the continued compliance of an applicant's DOV processes and procedures.

Trace-Back: a method of tracking components or product beginning at the end of a process (code or positive lot identification) and working back through the process either to the beginning or to a designated point to verify that the end item came from growers of domestic origin and was processed and/or packed domestically.

Verifiable Written Procedure: a document that specifies the way to perform an activity or process. It is a particular way of accomplishing something. The procedure should describe (1) what the activity is, (2) when the activity is performed, (3) who performs the activity, and (4) if applicable, how, where and why the activity is performed.